

FILED

MAY 05 2010

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
_____ DIVISION**

Dallas Loan Dugger)

Deborah Ann Dugger)

(Enter above the full name of the Plaintiff[s]
in this action.))

- vs -)

Bank of America)

Countrywide)

(Enter above the full name of **ALL** Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of **all** the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

1.10CV00076SNLJ

Case No. _____
(To be assigned by Clerk
of District Court)

COMPLAINT

- I. State the grounds for filing this case is Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

II. Plaintiff, Dallas L & Deborah A. DUGGER resides at

901 ADAM Street, Poplar Bluff Butler,
street address city county

MO, 63901, 573-718-9122
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

III. Defendant, Bank of America / Countrywide ~~Homes~~ lives at, or its business is located at

7105 Corporate Drive, ~~PO Box 222229~~, Plano, TX,
street address city county

TX, 75024-4100
state zip code

(if more than one defendant, provide the same information for each defendant below)

IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

On Jan. 26 2010 Bank of America/Countrywide mailed to us (Dallas L. & Deborah A. Dugger) Modification Documents dated Jan. 25 - 2010 requesting \$485.02. Under the Troubled Asset Relief Program (TARP), and Home Assistance modification Program (HAMP). Bank of America/Country Wide did Not just ignore Plaintiffs, but ignored TARP & HAMP Regulations by requiring fees upfront to modify their home loan which is prohibited under the federal regulations. We were also suppose to have from 1-26-10 to - 2-25-10 to ~~pay~~ ~~on or about 2-24-2010~~ pay up front fees - 485.02.

On or about Feb 4, 2010 was sent notice of Foreclosure before the time given ~~ON said modification allowance~~ ~~for documents to be gathered~~ denied of time. Bank of America/Country Wide Loans, ~~request~~ Plaintiffs ~~denied~~ access to (TARP) & (HAMP) by requesting up front fees. All TARP & HAMP funded financial establishments like Bank of America are required to offer solutions, not request up front fees. On 1-27-2010 I, Deborah Dugger, called Bank of America asking for copys of Note, Deed of Trust, Original Appointment of Successor trustee documents. Gabrielal with whom I spoke with stated they don't have them.

V. Relief: State briefly and exactly what you want the Court to do for you. ~~We pray for~~

~~What the Court can give us relief from today~~
~~denied, mental~~
We pray the Court would consider
relief FROM BANK OF AMERICA IN THE AMOUNT
\$500,000 FOR DELIBERATELY STEALING. ~~Would the Court~~
Request ORIGINAL document, pertaining to 901 Adam
Proof of Claim to the Debt.

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒

NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$500,000 NOT DOING WHAT BAC INSTRUCTED
THEY DO FOR ME. IN REFERENCE TO NOTE,
IE. MODIFICATION PROGRAM, STEALING ESCROW
FOR HEAVIER PLACINGS. CAUSED MENTAL ANGUISH AND

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☒

NO ☐

PHYSICAL
HARSHIP.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this ____ day of _____, 20__

Dorcas Dwyer
Dorcas Dwyer
Signature of Plaintiff(s)

Defendants stole plaintiffs Escrow funds in the amount of \$ 920.00. ~~Plaintiff~~ Plaintiff is on heart medication. When he called to inquire where his saved money went Defendants claimed they took it for no insurance. Plaintiff faxed them proof of insurance twice. Amount returned to account was around \$ 600.00! Plaintiff has went through so much stress, that he has had 3 attacks from being stolen from and denied the use of Troubled Asset Relief Program & Home Assistance Modification Program with Defendants requiring up front fee \$ 485.02 and now they are selling ~~Plaintiff's~~ Home June 2nd - 2010!

Your Honor, the TARP & HAMP guidelines state the plaintiff can use these laws to save their Home, and that is why we are then Defendants raised House payment.

Debra Duggen 5-5-10
Debra Duggen 5-5-10